

Magistrate Judge Michelle L. Peterson

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff

v.

JOSHUA REGAN,  
Defendant.

CASE NO. MJ25-105

COMPLAINT for VIOLATION

Title 18, U.S.C., Section 922(g)(1)

BEFORE, Michelle L. Peterson, United States Magistrate Judge, U. S.  
Courthouse, Seattle, Washington.

The undersigned complainant, Matthew Laramee, a Special Agent with the U.S.  
Department of Homeland Security, Homeland Security Investigations, being duly sworn,  
states:

**COUNT ONE**

**(Unlawful Possession of a Firearm)**

On or about February 25, 2025, in King County, within the Western District of  
Washington, JOSHUA REGAN, knowing he had been convicted of the following crimes  
punishable by a term of imprisonment exceeding one year:

i. *Violation of the Uniform Controlled Substances Act Delivery of Heroin*, in the Superior Court of Washington for King County, under case number 12-1-04833-5 SEA, on or about March 27, 2013; did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that is: *a Savage 22 caliber rifle model 987*, that had been shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

And the complainant states that this Complaint is based on the following information:

I, Matthew Laramee, being first duly sworn on oath, depose and say:

### **INTRODUCTION**

1. I am an “investigative or law enforcement officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, violations of numerous federal statutes.

2. I am a Special Agent with the U.S. Department of Homeland Security, Homeland Security Investigations, and have been so employed since 2020. I am currently assigned to the Office of the Special Agent in Charge in Seattle, Washington, specifically to the Counter-Proliferation Investigations (CPI) Group, where I investigate cases involving the illegal import and export of weapons and other items to and from the United States.

3. I have received formal criminal investigator training at the Federal Law Enforcement Training Center in Glynco, Georgia. I have also received formal training as a certified Firearms Instructor with the HSI Office of Firearms and Tactical Programs located in Fort Moore, Georgia. Based on my training and experience, I am familiar with the areas of criminal law, firearms law, firearms training, and firearms nomenclature. I am also familiar with the manners in which individuals illegally acquire and import

1 export-controlled merchandise from the United States to foreign countries and into the  
2 United States from foreign countries.

3 4. The facts set forth in this affidavit are based on my own personal  
4 knowledge; knowledge obtained from other individuals during my participation in this  
5 investigation, including other law enforcement officers; the review of documents and  
6 records related to this investigation; communications with others who have personal  
7 knowledge of the events and circumstances described herein; and information gained  
8 through my training and experience.

9 5. Because this affidavit is submitted for the limited purpose of establishing  
10 probable cause in support of a criminal complaint, it does not set forth each and every  
11 fact that I, or others, have learned during the course of this investigation.

12 **SUMMARY OF PROBABLE CAUSE**

13 6. On February 21, 2025, United States Magistrate Judge Brian A. Tsuchida  
14 authorized a search warrant under case number MJ25-092 to search 5210 12th Avenue  
15 NE, Apartment H, Seattle, Washington (hereinafter “the apartment”). I understood the  
16 apartment to be REGAN’s residence based on several sources, including: the Washington  
17 State Department of Licensing revealed that REGAN updated his address to the  
18 apartment on May 10, 2021, and had not changed his address since; on January 31, 2025,  
19 a United States Postal Inspector confirmed that Regan consistently received packages at  
20 the apartment; and on several occasions in January and February 2025 I observed a car  
21 most recently registered to REGAN (but with an expired registration) parked outside the  
22 apartment complex. (As discussed below, I have since developed additional confirmation  
23 that REGAN lives at the apartment.) I am not aware of any coresidents at the apartment,  
24 though I observed REGAN on February 22, 2025, departing the apartment with another  
25 person.

26 7. On February 25, 2025, HSI and other law enforcement agencies served the  
27 search warrant at the apartment. It is a one-bedroom, studio-style apartment, one of

1 approximately ten units in a residential house that has been converted into a multi-unit  
2 rental complex. After entering the complex's front door, the apartment is accessed from  
3 its own interior door. An FBI team breached the front door of the complex, then after  
4 knocking and announcing and receiving no response at the door of the apartment, forced  
5 open the apartment door to gain entry. They then performed a safety sweep of the  
6 apartment. REGAN was not present.

7 8. In total, nine firearms were seized by the FBI team performing the safety  
8 sweep and by HSI agents during the balance of the search. The firearms, beginning with  
9 the one charged in Count One, were located as described below, and some of them are  
10 depicted (not necessarily as they were found) in the subsequent photographs:

- 11 • A loaded Savage 22 caliber rifle model 987, found by the FBI team  
12 mounted over the bed.
- 13 • A loaded Winchester Super X pump shotgun, found by the FBI team near  
14 the front door.
- 15 • An unserialized AR15 style rifle, found by the FBI team mounted over a  
16 closet.
- 17 • A loaded, unserialized 9mm Polymer 80 Glock clone, found by the FBI  
18 team next to the bed.
- 19 • A loaded, unserialized 9mm Sig Sauer 320 with forward grip, found by the  
20 FBI team next to the bed.
- 21 • A loaded Wilson Combat 9mm pistol, found by the FBI team next to the  
22 bed.
- 23 • A 22 caliber Heritage revolver, found by the HSI team in the closet.
- 24 • A loaded AR15 style rifle made by Eagle Arms with attached suppressor,  
25 found by the HSI team in the closet.
- 26 • An AR15 style rifle from Rock River Arms, found by the HSI team in the  
27 closet.





1           9.     Among the ammunition loaded into the guns and found elsewhere in the  
2 apartment were (1) green-tipped rifle rounds, which are a partially steel core round  
3 designed to enhance the round's ability to penetrate hard objects that other lead core  
4 rounds typically would not be able to penetrate (such as body armor worn by law  
5 enforcement); and (2) fragmenting pistol rounds, which are designed to break apart into  
6 multiple smaller pieces upon impact. In total, the search team seized more than 600  
7 green-tipped rifle rounds, more than 40 fragmenting pistol rounds, and more than 900  
8 additional rounds of ammunition.

9           10.    The search team also found dozens of gun parts and accessories, including  
10 multiple suppressors and body armor, throughout the apartment.

11           11.    In the kitchen, the search team located a Crown Royal bag containing a  
12 plastic bag, which in turn contained a brown powder substance that HSI Special Agent  
13 Ernest McGeachy recognized through his training and experience as likely narcotics.  
14 Agent McGeachy field-tested the substance and it tested presumptively positive for  
15 methamphetamine. I weighed the substance, which in total (inclusive of the plastic  
16 packaging) weighs approximately 564 grams.

17           12.    The search team found additional evidence that REGAN is the apartment's  
18 resident. Among other indicia of occupancy, there was a missed delivery slip addressed  
19 to REGAN at the apartment's front door and a safe in the apartment containing  
20 REGAN's passport. A few days before the search, I also observed REGAN and another  
21 person departing the apartment complex together.

22           13.    Finally, on a shelf the search team found three United States passports and  
23 one Vietnamese passport that do not depict REGAN. I ran the U.S. passports through the  
24 Treasury Enforcement Communications System (TECS), which is a database maintained  
25 by Customs and Border Protection that tracks (among other things) whether U.S.  
26 passports have been reported lost or stolen. One of the U.S. passports had all of the pages  
27 removed but still displayed the passport number, and TECS confirmed that a passport

1 with that number was reported stolen on October 31, 2022. The second U.S. passport  
2 showed its possessor's full name, and TECS confirmed that person reported her passport  
3 stolen on January 20, 2025, when according to TECS records her boyfriend's vehicle was  
4 stolen. The final U.S. passport and the Vietnamese passport belonged to the same  
5 individual, and TECS did not show that person as having reported their U.S. passport  
6 stolen or lost, but Seattle Police Department records show that he reported his vehicle  
7 stolen on January 20, 2025.

#### 8 **INTERSTATE NEXUS OF FIREARM**

9 14. Bureau of Alcohol, Tobacco, and Firearms (ATF) Special Agent Brian  
10 Arnold, an agent who is an expert at conducting interstate nexus reviews, reviewed  
11 photographs of certain firearms described above. Based on his experience, knowledge,  
12 and research, he preliminarily determined that the firearm referenced in Count One—a  
13 *Savage 22 caliber rifle model 987*—is a “firearm” as defined by federal law, and was  
14 manufactured outside of the State of Washington, and thus traveled in interstate and/or  
15 foreign commerce, in order to be received or possessed in the State of Washington.

#### 16 **REGAN'S CRIMINAL HISTORY**

17 15. I have reviewed criminal history documents relating to REGAN and found  
18 that he was previously convicted of at least the following crime punishable by a term of  
19 imprisonment exceeding one year: *Violation of the Uniform Controlled Substances Act*  
20 *Delivery of Heroin*, in the Superior Court of Washington for King County, under case  
21 number 12-1-04833-5 SEA, on or about March 27, 2013.

22 16. For the above-listed offense, REGAN was sentenced to a term of post-  
23 conviction imprisonment of one year and one day, according to the Judgment and  
24 Sentence from King County Superior Court. That document confirms that the total  
25 standard range was 12+ to 20 months.

